

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

**SYBOLOGY INNOVATIONS, LLC,**

Plaintiff,

v.

**CARDINAL HEALTH, INC.,**

Defendant.

Civil Action No.: 3:21-cv-00043-FM

**TRIAL BY JURY DEMANDED**

**UNOPPOSED MOTION TO STAY ALL DEADLINES  
AND NOTICE OF SETTLEMENT**

Plaintiff Symbology Innovations LLC, by and through undersigned counsel and subject to the approval of this Court, hereby files this Motion to Stay All Deadlines and Notice of Settlement, and in support thereof, respectfully show the Court as follows:

All matters in controversy between Plaintiff and Defendant Cardinal Health, Inc. have been settled in principle. The parties are in the process of memorializing the terms of a written settlement agreement. The parties anticipate that they will be able to perfect such terms within sixty (60) days. Accordingly, Plaintiff respectfully requests that the Court grant a stay of the proceedings between the Parties, including all deadlines, until June 28, 2021.

Good cause exists for granting this Unopposed Motion, as set forth above. The motion is not filed for purposes of delay but so that justice may be served.

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that counsel for Plaintiff conferred with Defendant about the issues presented here. Defendant indicated that it was not opposed to the relief sought herein.

Dated: April 30, 2021

Respectfully submitted,

Together with:

KIZZIA & JOHNSON, PLLC

Andrew S. Curfman  
(*Pro hac vice forthcoming*)  
SAND, SEBOLT & WERNOW CO., LPA  
Aegis Tower – Suite 1100  
4940 Munson Street NW  
Canton, Ohio 44718  
Telephone: (330) 244-1174  
Facsimile: (330) 244-1173  
Email: andrew.curfman@sswip.com

/s/ Jay Johnson  
Jay Johnson  
1910 Pacific Avenue – Suite 13000  
Dallas, Texas 75201  
Telephone: (214) 451-0164  
Facsimile: (214) 451-0165  
Email: jay@kjpllc.com

ATTORNEYS FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served on April 30, 2021 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

/s/ Jay Johnson  
Jay Johnson